

UCRSF
21-3
8/10/07

teckcominco

PROGRESS REPORT NO. 13

TO: Kevin Rochlin – U.S. Environmental Protection Agency (EPA), Region 10
(R10) - via Email
Sally Thomas – EPA, R10 (via Email)
Monica Tonel – EPA, R10 (via Email)

FROM: Marko Adzic – Teck Cominco American Incorporated (TCAI)

CC: David Godlewski – TCAI (via Email)
Bruce Duncan – EPA, R10 (via Email)
David Charters – EPA, Headquarters (via Email)
Lucinda Jacobs – TCAI Technical Team (via Email)

DATE: August 10, 2007

FILE NO: 1-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 13 Month Ending July 2007

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Preliminary response to comments received on the draft RI/FS work plan were submitted to EPA and the participating parties¹ on July 31, 2007. As noted at the time of the submittal, given that revisions to the RI/FS work plan are simultaneously occurring, there is the potential that minor modifications to the responses may be required as a result of concomitant RI/FS work plan revisions (e.g., consistency in figure and/or table numbers). It should be noted that prior to submitting the aforementioned response to comments, an on-line meeting using 'Go-to-Meeting' was conducted on July 25, 2007 with EPA and participating parties. The purpose of the on-line meeting was for TCAI and its Technical Team to outline and identify how comments received on the draft RI/FS work plan were being, categorized, addressed, and what resulting changes can be expected within the revised RI/FS work plan. Based on the positive feedback received regarding the efficiency of conducting on-line meetings, it is anticipated that a similar format may be used on August 9, 2007 to review the response to comments. At the time of writing

¹ As outlined within the June 2, 2006 Settlement Agreement participating parties include the U.S. Department of the Interior, State of Washington Department of Ecology, Spokane Tribe of Indians and the Confederated Tribes of the Colville Reservation. In addition, a copy of the preliminary response to comments was also forwarded to the Government of Canada.

Teck Cominco American Incorporated
PO Box 3087, Spokane, WA 99220
Telephone: (509) 747-6111 * Facsimile: (509) 922-8767

USEPA SF



1297784

however, the necessity of the aforementioned meeting has not yet been confirmed by EPA.

Notwithstanding the potential need to review and discuss response to comments, an on-line meeting will be hosted by TCAI and its Technical Team to present and review the initial study design (i.e., 2007/08) and sequencing; and the inter-relationships and dependencies between studies. Based on the nature of comments received during the meeting, it is anticipated that final revisions to the RI/FS work plan can be completed with the intent of submitting the revised RI/FS work plan on approximately September 14, 2007².

The draft screening level ecological risk assessment (SLERA) is undergoing internal review. Given that the SLERA shares several common elements with the draft RI/FS work plan (e.g., Conceptual Site Model); and to ensure consistency between the documents, it is anticipated that the draft SLERA will be submitted to EPA shortly after the revised draft RI/FS work plan. Once the revised RI/FS work plan and draft SLERA are submitted for review and comment, it is anticipated that an on-line meeting to review and discuss the aforementioned reports may be required in October 2007. At that time, discussions related to additional data analyses per comments received by EPA on the draft sediment, fish tissue and bioassay reports and how they relate to the Baseline Ecological Risk Assessment (BERA) work plan may also be initiated; but is dependent on having sufficient time to review the draft reports and associated comments³.

Efforts to compile and summarize discussion items from the April 17-19, 2007 workshop conducted in Seattle, Washington have been completed and posted on the project website (www.ucr-rifs.com). Posted materials include: a summary of the plenary sessions, summaries of individual break-out sessions (i.e., aquatic, terrestrial, transport & fate, and human health sessions), copies of PowerPoint presentations made during the workshop, and photographs of notes/drawings recorded during the workshop.

A summary of activities (e.g., deliverables) completed to date, and those anticipated within in the near future, are presented within Table 1 below.

² As discussed with EPA on July 26, 2007 and August 2, 2007, pending comments received during the August 9, 2007 on-line meeting there is the potential for a delay with work plan revisions if there are significant differences and/or issues associated with the proposed study design and sequencing; or with the response to comments and how the RI/FS work plan will be revised.

³ At the time of writing, copies of the draft fish tissue and bioassay reports have not been made available to TCAI and its Technical Team. As a result, comments received on the draft documents by participating parties and forwarded to TCAI by EPA, can not be evaluated without the proper context (i.e., the draft reports).

Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities

Task No.	Task Description	Status	Issues	Estimated Completion Date ¹
1.	2005 Field Data Transfer	Complete	None to report at this time	<u>July 31, 2006</u>
2.	Technical Memorandum ²	Complete	None to report at this time	<u>October 27, 2006</u>
3.	Draft RI/FS Work Plan	Complete	None to report at this time	<u>December 28, 2006</u>
4.	Sampling and Analysis Plan (SAP) ³	Complete	None to report at this time	<u>February 26, 2007</u>
5.	Health and Safety Plan	Complete	None to report at this time	<u>February 26, 2007</u>
6.	Cultural Resources Coordination Plan	Complete	None to report at this time	<u>February 26, 2007</u>
7.	Revised RMAO Memorandum ⁴	Complete	None to report at this time	<u>March 11, 2007</u>
8.	Additional Trail Data	Complete	None to report at this time	<u>May 6, 2007</u> ⁵
9.	April Workshop Summary	Complete	None to report at this time	<u>July 12, 2007</u>
10.	Revised Draft RI/FS Work Plan	On-Going	None to report at this time	TBD ⁶
11.	Screening Level ERA	On-Going	None to report at this time	TBD
12.	Surface Water SAP ⁷	Temporarily Delayed	None to report at this time	TBD

- Notes:
1. Dates that have been underlined represent the actual day that the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.
 2. As outlined within the Agreement, the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.
 3. The SAP submitted in fulfillment of Paragraph 13 of the Agreement was the *2007 Sediment Investigation of Beaches and Depositional Areas*.
 4. The draft technical memorandum on risk-based management action objectives (RMAOs) is to be revised per EPA's January 16, 2007 comments.
 5. Following a request outlined by EPA in a letter dated February 1, 2007 (received on February 5, 2007) TCAI has compiled additional information on the Trail Facility so as to assist in the identification of contaminants of potential concern (COPCs) as outlined within Paragraph 24 of the Agreement. An electronic version of the deliverable was forwarded to EPA on May 6, 2007 with hard copies delivered shortly thereafter. In addition, a second deliverable identified as "*Business Confidential*" information was submitted to EPA legal counsel under separate cover on May 7, 2007 by Pillsbury Winthrop Shaw Pittman (i.e., TCAI legal counsel) on behalf of TCAI.
 6. It is anticipated that the revised RI/FS work plan will be submitted in September 2007 but an exact date has yet to be determined and is pending receipt of the official EPA comments and associated letter requesting a revised RI/FS work plan.
 7. Activities to complete this task have been temporarily delayed based on feedback/inputs from the April 17-19, 2007 meeting with EPA and participating parties. It is important that the key elements of the draft RI/FS work plan and screening level benchmarks be agreed upon prior to finalizing the respective task.
- ERA = Ecological Risk Assessment
SAP = Sampling & Analysis
TBD = To Be Determined

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.